



King County

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October 9, 2015

Victoria Wachino
Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
200 Independence Ave SW
Washington, DC 20201

Dear Ms. Wachino:

King County is pleased to offer its strong support for Washington's recent application to the Centers for Medicare and Medicaid Services for a Section 1115 Medicaid Demonstration waiver. King County is a local government whose responsibilities include a range of regional public health, behavioral health, human services, community and economic development, and justice systems for a diverse county of over 2 million residents, the most populous in the state and home to over a third of Washington state's population.

Washington has embraced many opportunities through the Affordable Care Act to bring affordable health care coverage to residents, effectively reducing the uninsured rate from 14 percent to 9.2 percent statewide—from 12 percent to 7.6 percent in King County alone. We are proud of these important gains, and with over 418,000 county residents now covered through Medicaid it is critical to focus our collective attention on assuring a strong and sustainable Medicaid program. The state's Healthier Washington plan, along with the flexibility and innovation sought through the state's Section 1115 Medicaid Demonstration waiver application, creates the environment in which this important work can happen.

Healthier Washington is well aligned with King County's regional transformation agenda articulated in the 2013 King County Health and Human Services Transformation Plan. The transformation plan charts a five-year course to improve health and social

outcomes and to reduce inequities for the residents and communities of King County, Washington. We are hopeful that through the strategies proposed in the waiver application, partners across our region can build on and accelerate efforts to transform our regional system of care and improve population health.

To help assure that the ambitious objectives of the Section 1115 Medicaid Demonstration waiver application can be achieved, we would like to highlight three areas where we see a particular need for working together with state partners to formulate an effective path forward.

- **Create a transformation project menu under Initiative 1 that balances strategies across population health and delivery system reforms.** In order to achieve the desired health and social outcomes described in the waiver application, the transformation project menu must include a balance of prevention and population health related strategies as well as strategies targeted toward delivery system reforms focused on higher risk and higher cost populations with complex health conditions.

An example of why this balance matters can be seen in our work on the Familiar Faces Initiative, cited in Washington's Section 1115 Medicaid Demonstration Waiver application. Familiar Faces are defined as individuals booked into our county jail four or more times in a one-year period who also have a mental health or substance use disorder. While the focus of Familiar Faces is to make progress towards a system that better serves the population and results in improved outcomes and lower per capita costs, data describing the Familiar Faces, indicate that more than 50% of these individuals encountered the juvenile justice system earlier in their lives. Simply put, while we must improve the current system serving our Familiar Faces of today to achieve the Triple Aim, we cannot ignore the adverse childhood experiences and community contexts that often lead to the longer-term outcomes of behavioral health issues, chronic health conditions, repeated incarcerations and homelessness. The toolkit development needs to reflect this reality if we are ever to bend the cost curve.

We support the development of a workgroup for this important task, and a process that engages stakeholders in a meaningful way and are prepared to assist in developing a menu that includes strategies informed by evidence and data.

- **Strong coordination of substance use system redesign opportunities.** We request that HCA and CMS consider how best to incorporate the emerging opportunities to expand the range of services available to individuals

experiencing substance use disorders to help achieve the Triple Aim and advance system reform. An example of this is the July 27, 2015 State Medicaid Director letter focused on 1115 waiver authority for improving systems of care for individuals with substance use disorders. In addition to this, there have been a number of announcements in recent weeks from the Department of Health and Human Services about changing rules and opportunities related to medication assisted treatment (MAT) and other potential flexibilities to address the opioid epidemic. Providing flexible new delivery options for individuals with a substance use disorder provides significant opportunity for innovation in integrated behavioral health treatment as Washington moves toward integrated behavioral health by 2016 and fully integrated physical and behavioral health by 2020.

- **Continuing to work together to explore roles for the Accountable Communities of Health.** We look forward to further dialogue regarding the proposed roles under Initiative 1 of the emerging Accountable Communities of Health (ACH). King County both staffs and is a member of our region's evolving ACH structure, working closely with partners from many other sectors both public and private. We value highly the regional role and regional voice in health system transformation, and believe that the ACHs stand to be important vehicles for brokering the clinical and population system partnerships that are ultimately necessary to achieve the Triple Aim and take interventions to scale. Many details regarding the optimal and specific roles of the ACHs relative to the oversight of Initiative 1 transformation projects warrant further discussion, and we look forward to being at the table in the critical work ahead to develop and discuss options. Two areas of particular concern to us are (1) assuring that adequate resources flow to local partners to address the change management and leadership challenges that arise as waiver-related coordination and transformation work is undertaken, and (2) assuring that resources flow to enable meaningful inclusion in planning, design, and evaluation work of consumers and communities who stand to be affected by the waiver transformation projects.

In closing, we want to express our strong support for Washington's Section 1115 Medicaid Demonstration waiver. We believe that the three main domains proposed in the waiver—the establishment of regionally driven transformation projects, the creation of new opportunities for long-term services and supports for our aging population, and the foundational supports such as supportive housing and supported employment—will set Washington's Medicaid program on a more secure pathway towards meeting its obligation to our residents and will allow important learning to happen here in the state and elsewhere about how to achieve the Triple Aim. We look forward to continuing to work with the leadership and teams that make up *Healthier Washington* in support of

Ms. Victoria Wachino

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achieving healthier people and communities in King County and throughout Washington State.

If you have any questions about our comments, please contact Betsy Jones, King County Executive Office, at betsy.jones@kingcounty.gov.

Sincerely,



Patty Hayes
Director
Public Health-Seattle & King County



Adrienne Quinn
Director
King County Department of Community
and Human Services



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Health and Human Potential Policy
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